

February 14, 2002

William F. Caton
Acting Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation
***Numbering Resource Optimization* – CC Docket No. 99-200**

Dear Mr. Caton:

Pursuant to Section 1.1206 of the Commission's rules, William L. Ball, Vice President Public Policy, representing the OnStar Corporation, Anne E. Hoskins, Regulatory Counsel, and Lolita D. Smith, Associate Director Regulatory Matters, representing Verizon Wireless submit this notice in the above-captioned docketed proceeding of an *ex parte* meeting with Cheryl Callahan and Jennifer Gorny, Attorneys with the Network Services Division of the Common Carrier Bureau. The participants discussed the provisions of the *Third Numbering Resource Optimization Order* that reference service specific overlays ("SOs") as they relate to vehicle response services and personal calling services offered by OnStar. Specifically, OnStar offered additional background to its November 15, 2001, *ex parte* submission in this proceeding.

After describing the nature of its OnStar Personal Calling feature ("OPC") that allows customers to make prepaid, hands-free, voice activated telephone calls as well as receive calls in their vehicles, OnStar explained that this service is geographically sensitive. OnStar's OPC customers receive geographically based telephone numbers that are associated with the customer's home or business. OnStar's experience with its customers bears out customer-sensitivity to area codes and to locally-rated land-to-mobile calling. For example, customers often request a specific NPA NXX from the pool of available numbers.

If permanent SOs are authorized to requesting states, subscribers with OnStar's Personal Calling service would endure the same inconveniences associated with forced area code changes as other CMRS subscribers. In addition, any take-backs would impose significant costs, customer inconvenience, and a competitive disadvantage *vis-à-vis* other services. OnStar expressed its concern that the *Third Report and Order* appears to promote a presumption that state petitions which seek to permanently segregate OnStar's telematics services from other geographically sensitive CMRS services and take back numbering resources would be authorized.

In cooperation with Verizon Wireless, OnStar provides geographically based numbering resources to customers for personal calling and recycles those numbers upon deactivation of its service.¹ In doing so, OnStar and Verizon Wireless maximize the efficiency of number assignment and utilization. As an in-vehicle, geographically based service complementing traditional CMRS services, OnStar's telematics services should not be singled out for discriminatory treatment with respect to assignment of numbering resources.²

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

William L. Ball
Vice President, Public Policy

¹ Customers with OnStar equipped vehicles that are not engineered with OPC capability or are not in an area where OPC is available, do not receive geographically based numbers, but utilize non-geographic based 500 numbers.

² OnStar expressed the view that disadvantaging hands-free services such as those provided by it would be inconsistent with efforts to improve highway safety by reducing driver distraction.